



1313 North Market Street
P.O. Box 951
Wilmington, DE 19801-0951
302 984 6000
www.potteranderson.com

David E. Moore
Partner
Attorney at Law
dmoore@potteranderson.com
302 984-6147 Direct Phone
302 658-1192 Firm Fax

May 12, 2022

VIA ELECTRONIC FILING

The Honorable Stephanos Bibas
James A. Byrne United States Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *Thomson Reuters Enterprise Centre GmbH et al. v. ROSS Intelligence Inc.*,
C.A. No. 20-613-SB

Dear Judge Bibas:

Plaintiffs Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (“Plaintiffs”) and Defendant ROSS Intelligence Inc. (“Defendant”) (collectively, the “Parties”) respectfully submit this Joint Status Report.

1. Pending Motions

There are no pending substantive motions. The Parties submitted a joint letter on April 5, 2022 (D.I. 161) requesting a briefing schedule and teleconference related to a discovery dispute, discussed *infra* at section 2.

Plaintiffs’ deadline to respond to ROSS’ antitrust counterclaims was originally set for May 10, 2022, while Defendant’s deadline to amend its counterclaims is May 20, 2022. The Parties conferred and agreed that Plaintiffs can answer or otherwise respond to the antitrust counterclaims, regardless of any amendment, by June 22, 2022, subject to the Court’s approval. On May 6, 2022, the Parties submitted a stipulation to that effect for Your Honor’s signature. *See* D.I. 179.

2. Discovery

The Parties have been working diligently to complete fact discovery. Discovery related to the antitrust and California Unfair Competition Law counterclaims was stayed by the Court. D.I. 41.¹ During that stay, the Parties substantially completed fact discovery with regard to Plaintiffs’ copyright and tortious interference claims and ROSS’s other counterclaims (Counts I-V), with the exception of three depositions that are scheduled to take place this month. Although the Parties both recognize that they will need additional time to conduct discovery with regard to

¹ The Scheduling Order is attached to this Joint Status Report as Exhibit A.

The Honorable Stephanos Bibas

May 12, 2022

Page 2

ROSS's antitrust counterclaims, they have not yet reached an agreement on a schedule for those claims.

The Parties have agreed to extend the existing deadlines for expert discovery and summary judgment by 45 days, subject to the Court's approval, and will submit a stipulation to that effect shortly. The Parties are continuing to meet and confer, and propose submitting a stipulation or competing submissions for the final schedule.

There is currently one discovery dispute before the Court. On April 5, 2022, the Parties requested a briefing schedule for a dispute related to Plaintiffs' second supplemental response to ROSS's Contention Interrogatory No. 1 ("IDENTIFY the specific portions of the WESTLAW CONTENT that you claim is subject to copyright that ROSS INFRINGES."). The Court has not set a briefing schedule for that dispute.

3. Settlement or Mediation

The Parties participated in a mediation before Magistrate Judge Mary Pat Thygne on October 21, 2021. No portion of the claims in this matter have been settled. The Parties are amenable to further settlement discussions, through either the Court or a private mediator.

4. Conferences

There are no upcoming conferences set by the Court.

5. Other Matters

The Parties also ask the Court to clarify whether the procedures set forth in the original Scheduling Order, particularly for the resolution of discovery disputes, are still operative.

Respectfully,

/s/ David E. Moore

David E. Moore

DEM:nmt/10135871

Enclosure

cc: Counsel of Record (via electronic mail)